

Enlace de Familias/Holyoke Family Network

299-301 Main Street
Holyoke, Massachusetts 01040
413-532-9300
413-552-3991[fax]

Marlene H.
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

July 25, 2018

Re: WC Docket Nos. 18-143, 10-90 and 14-58; FCC 18-57
Proposed Rule by FCC on 06/13/2018 ID: FCC-2018-0212-0002
<https://www.fcc.gov/ecfs/filings>

Dear Ms. Dortch:

As a community-based non-profit organization that provides vital services to the people of Puerto Rico and has been instrumental in providing aid in the aftermath of the hurricanes to those arriving from the Island.

Holyoke, Massachusetts where we are located has the highest population of Puerto Ricans per capita in the United States. We are a small community of just over forty thousand. However, during the three months post Irma and Maria Hurricane's this office was flooded with relatives of those living on the Island. They were hoping we had some miracle way of getting in touch with their loved ones or anyone in their community on the Island. All this community had was the horrific media coverage of what seemed like the end of the world on the Island of Puerto Rico.

Today ten months after hurricanes Irma and Maria, residents of Puerto Rico continue to arrive at our doors with no intent of returning to the Island. One of the major issues they raise is the lack of emergency communications once power is lost. Our State has had to struggle with the influx of displaced hurricane victims intending to resettle here and although communications is not the only reason people leave, it is on the top of the list. We have seen over two thousand individuals in this office alone and we are hoping that you will seriously consider our request.

I submit these comments for consideration by the Commission regarding the implementation of **Uniendo a Puerto Rico Fund**.

I support the efforts of the **Coalition to Fund CPR (Centros de Preparación y Respuestas)**

The Commission has publicly stated it recognizes the need for a longer-term solution to "rebuild, improve and expand service in Puerto Rico and the U.S. Virgin Islands" in the wake of the devastation of communication networks. The Commission proposes to dedicate funding specifically to "fixed and mobile providers" to provide critical "fixed voice and broadband services."

On behalf of the U.S. citizens residing on these islands, I implore you to consider the following. It is undeniable that these islands need and deserve reliable communication systems that can withstand natural disasters and prevent our fellow countryman from ever suffering such devastation again. As such, the funds dedicated through the Uniendo a Puerto Rico Fund are well directed. We strongly

suggest that the Commission include in the proposed rules for the distribution and implementation of the funds the following:

1. Stage 1 funding was too narrowly focused. It excludes locally based satellite facilities. This hampers economic development in Puerto Rico.
2. New entrants with exciting technology better able to withstand extreme weather and natural disasters were inadvertently excluded.
3. Stage 2 and later rounds of funding must be available to new entrants. Specially entrants with satellite facilities in Puerto Rico.

It is also imperative that the FCC understands that any long-term investment in the communications infrastructure of Puerto Rico **must** include satellite technology. Not only must satellite technology be included, it must be **a priority** in any restoration funding efforts. Satellite broadband was the only reliable communications system in the aftermath of the hurricanes and must be fully implemented across the island, specially in rural and mountainous areas, in order to build a truly resilient and connected Puerto Rico. Funding must allow for innovative, independent community based and multi sector telecommunications networks to be established.

Leading minds in the telecommunications and spectrum policy fields, as well as former senior members of the Commission, have publicly expressed views indicating that the absence of satellite technology in future telecommunications developments on the islands would ignore nearly five decades of technological advancements and in fact, invest hundreds of millions of dollars in a communications systems that would leave the residents of these islands left behind in a tremendous digital divide.

FCC Chairman Ajit Pai himself recently declared in an interview on WKAQ580 radio while in Puerto Rico, that the FCC's intention was to "put Puerto Rico squarely on the map when it comes to digital innovation". To achieve what Chairman Pai has declared, satellite technology must be a priority for new communication systems. To exclude satellite technology from inclusion in the **Uniendo a Puerto Rico Fund** would be a grave oversight.

Satellite technology is currently being utilized with great success across the continental United States, even made available through FCC subsidies to the most remote and un-serviced locations. Advances in technology now offer next-generation satellite system that have the ability to provide Puerto Rico with the latest technology and ever-increasing broadband speeds.

Satellite broadband is a multifaceted system that allows for cellular communication as well as internet connection. Because it is not a terrestrially based system, satellite is protected from the threat of storms and natural disasters. Satellite is also more cost effective, unlike installing cell towers, telephone poles and restringing fiber which can cost over \$22,000 per mile. Satellite can also connects even the most remote Puerto Rican communities to much needed emergency services and resources. Finally, satellite is a more timely solution to protect Puerto Rico in the fact of future natural disasters

As storms increase in frequency and strength, it is imperative that Puerto Rico rebuild its demolished infrastructure to withstand the next hurricane season. Terrestrial communication cannot be relied upon, as we have already learned. As you know, 86% of all cell phone towers were put out of service due to the hurricane. Puerto Rico suffered \$1.5 billion in damages to our communications network – leaving us stranded and without hope for supplies or assistance. The only system that worked was satellite broadband. In fact, even **FEMA relied on this system and supplied Puerto Ricans with satellite phones.**

Thank you for your dedication to serving the people of Puerto Rico during this difficult time and for your consideration of our remarks. Should you have any questions or wish to speak further, please contact us at enlace.betty@gmail.com or 413-532-9300.

Sincerely,

A handwritten signature in cursive script, reading "Betty Medina Lichtenstein". The signature is written in dark ink and is positioned to the right of the word "Sincerely,".

Betty Medina Lichtenstein
Executive Director